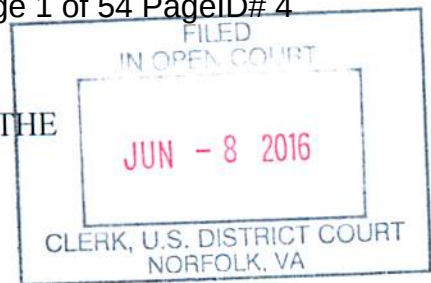


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division



UNITED STATES OF AMERICA )

v. )

RONALD GERARD YARBOROUGH, )

a/k/a "G," "G.R.A.M.S.," )

(Counts 1, 4, 7-9, 18, 25, 26, 32, 34, 56, 72, )  
87, 88, 91, 92, 95, 97, 99-101, 103, 106, )  
and 108) )

BRANDON ANTHONY STEPHENS, )

a/k/a "Killa," )

(Counts 1, 7, 21-24, 27, 29, 30, 42-44, 46, )  
47, 48, 50-53, 56, 58-61, 63, 64, 67, 69-72, )  
74, 78, 80-86, 89, 90, 93, 94, 96, 98, )  
102-105, 107, and 108) )

DETRON LASHANNON JACKSON, )

a/k/a "Bae Dollas," )

(Counts 1, 2, 3, 5, 6, 8, 9, 11-15, 20, 28, 31, )  
45, 49, 54, 55, 57, 62, 65, 66, 68, 70, 73, )  
75-77, 79, and 99) )

RONALD ANTONIO JOHNSON, )

a/k/a "Pooh," )

(Counts 1, 11, 13, 16, 17, 34, 36, 37, 38, )  
39, 40, and 61) )

DEANGELO RAYDEL HYMAN, )

a/k/a "Bo," "Safety," )

(Counts 1, 7, and 88) )

CARLTON ARNELL WILSON, )

a/k/a "Jug," )

(Counts 1, 10, 19 and 33) )

AJENE HAMANI JORDAN, )

a/k/a "AJ," )

(Counts 1, 35, 41, 92, and 100) )

Defendants. )

UNDER SEALCRIMINAL NO. 2:16-cr- 85

21 U.S.C. § 846

Conspiracy to Distribute and Possess with Intent  
to Distribute Cocaine, Cocaine Base and Heroin  
(Count 1)

21 U.S.C. §§ 841(a)(1) and 18 U.S.C. § 2

Distribute and Possess with Intent to Distribute  
Heroin  
(Counts 6, 13, and 18)

21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2

Distribute and Possess with Intent to Distribute  
Cocaine, Cocaine Base, and other Controlled  
Substances  
(Counts 2-5, 8, 10, 11, 12, 15, 16, 17  
19-38 and 41)

18 U.S.C. § 924(c)

Possession of a Firearm in Furtherance of Drug  
Trafficking  
(Counts 7, 9, 14, and 39)

18 U.S.C. §§ 922(g) and 924(a)(2)

Felon In Possession of a Firearm  
(Count 40)

21 U.S.C. § 843(b)

Using Communication Facilities to Cause,  
Commit, and Facilitate Felony Violations of the  
Controlled Substances Act  
(Counts 42-108)

21 U.S.C. § 853

Forfeiture Allegation

INDICTMENT

June 2016 Term, at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

From in or about 2009, the exact date being unknown to the Grand Jury, and continuously thereafter up to and including the date of this indictment, within the Eastern District of Virginia and elsewhere, RONALD GERARD YARBOROUGH, a/k/a "Ron G," G.R.A.M.S., BRANDON ANTHONY STEPHENS, a/k/a "Killa," DETRON LASHANNON JACKSON, a/k/a "Bae Dollas," RONALD ANTONIO JOHNSON, a/k/a "Pooh," DEANGELO RAYDEL HYMAN, a/k/a "Bo," Safety," CARLTON ARNELL WILSON, a/k/a "Jug," and AJENE HAMANI JORDAN a/k/a "AJ," the defendants herein, did unlawfully, knowingly, and intentionally combine, conspire, confederate and agree with each other and with other persons both known and unknown to the Grand Jury to commit one or more of the following offenses against the United States:

1. To knowingly, intentionally and unlawfully distribute and possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The quantity of cocaine involved in the conspiracy is:

- (a) With respect to defendants RONALD GERARD YARBOROUGH, BRANDON ANTHONY STEPHENS, DETRON LASHANNON JACKSON, RONALD ANTONIO JOHNSON, DEANGELO RAYDEL HYMAN, and CARLTON ARNELL WILSON, the amount involved in the conspiracy attributable to RONALD GERARD YARBOROUGH, BRANDON ANTHONY STEPHENS, DETRON LASHANNON JACKSON, RONALD ANTONIO JOHNSON,

DEANGELO RAYDEL HYMAN, and CARLTON ARNELL WILSON, as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to RONALD GERARD YARBOROUGH, BRANDON ANTHONY STEPHENS, DETRON LASHANNON JACKSON, RONALD ANTONIO JOHNSON, DEANGELO RAYDEL HYMAN, and CARLTON ARNELL WILSON, is five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii); and

- (b) With respect to defendant AJENE HAMANI JORDAN, the amount involved in the conspiracy attributable to AJENE HAMANI JORDAN as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is less than five-hundred (500) grams of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C);

2. To knowingly, intentionally and unlawfully distribute and possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack," a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The quantity of cocaine base ("crack cocaine") involved in the conspiracy is:

- (a) With respect to defendants RONALD GERARD YARBOROUGH, BRANDON ANTHONY STEPHENS, DETRON LASHANNON JACKSON, RONALD ANTONIO JOHNSON, and CARLTON ARNELL WILSON, the amount involved in the conspiracy attributable to RONALD GERARD YARBOROUGH, BRANDON ANTHONY STEPHENS, DETRON LASHANNON JACKSON, RONALD ANTONIO JOHNSON, and CARLTON ARNELL WILSON, as a result of their own conduct, and the conduct of

- other conspirators reasonably foreseeable to RONALD GERARD YARBOROUGH, BRANDON ANTHONY STEPHENS, DETRON LASHANNON JACKSON, RONALD ANTONIO JOHNSON, and CARLTON ARNELL WILSON, is two-hundred and eighty (280) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” in violation of Title 21, United States Code, Section 841(b)(1)(A)(iii); and
- (b) With respect to defendants DEANGELO RAYDEL HYMAN and AJENE HAMANI JORDAN, the amount involved in the conspiracy attributable to DEANGELO RAYDEL HYMAN and AJENE HAMANI JORDAN as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to DEANGELO RAYDEL HYMAN and AJENE HAMANI JORDAN is twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii).

3. To knowingly, intentionally and unlawfully distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The quantity of heroin involved in the conspiracy is:

- (a) With respect to defendants DETRON LASHANNON JACKSON and RONALD ANTONIO JOHNSON, the amount involved in the conspiracy attributable to DETRON LASHANNON JACKSON and RONALD ANTONIO JOHNSON as a result of their own conduct, and the conduct of and other conspirators reasonably foreseeable to DETRON LASHANNON JACKSON and RONALD ANTONIO JOHNSON is one-hundred (100) grams or more of a mixture and substance containing a detectable

amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B)(i).

- (b) With respect to defendant RONALD GERARD YARBOROUGH, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is less than one-hundred (100) grams of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

WAYS, MANNER AND MEANS TO ACCOMPLISH THE CONSPIRACY

The ways, manner and means by which this purpose was carried out included, but were not limited to the following:

1. It was further a part of the conspiracy that the defendants and unindicted co-conspirators distributed and possessed with the intent to distribute quantities of cocaine, cocaine base, and heroin in the Eastern District of Virginia, and elsewhere.
2. It was further a part of the conspiracy that the defendants and unindicted co-conspirators supplied and furnished cocaine, cocaine base, and heroin to each other and other conspirators on an “as-needed basis.”
3. It was part of the conspiracy that the defendants and unindicted co-conspirators played different roles, took upon themselves different tasks and participated in the affairs of the conspiracy through various criminal acts. The defendants and unindicted co-conspirators made themselves and their services available at various times throughout the conspiracy and would participate in selected narcotics ventures on an “as needed” basis.
4. It was further a part of the conspiracy that the defendants and unindicted co-conspirators would purchase and receive cocaine from suppliers in Virginia, New York, Atlanta, Georgia and elsewhere, and would arrange for the cocaine and heroin to be transported to and in Virginia, usually in

hidden traps in privately owned vehicles and also in rental vehicles.

5. It was further a part of the conspiracy that the defendants and unindicted co-conspirators derived substantial gross receipts from their unlawful activities.

6. It was further a part of the conspiracy that the defendants and co-conspirators would and did utilize various locations such as hotel rooms, a music studio, businesses, houses, and apartments to store, possess, cook and distribute cocaine, crack cocaine, and heroin, including but not limited to the following:

- a) residence in first block of King George Quay, Chesapeake, Virginia;
- b) music studio in the 5700 block of Arrowhead Drive, Virginia Beach, Virginia;
- c) apartment, Misty Woods Apartments, Jefferson Avenue, Newport News, Virginia;
- d) apartment on Berkley Avenue in Norfolk, Virginia;
- e) apartment in the Cambridge Manor Apartments, Chesapeake, Virginia;
- f) apartment in the MacDonald Manor section of Chesapeake, Virginia;
- g) apartment in the Hunter's Point Apartments, Chesapeake, Virginia;
- h) apartment in the 1800 block of Sparrow Road, Chesapeake, Virginia;
- i) residence in the 3000 block of Fireside Road, Chesapeake, Virginia;
- j) residence in the 2000 block of Plow Lane in Chesapeake, Virginia;
- k) residence on Flower Lane in Chesapeake, Virginia;
- l) residence on Douglas Avenue in the Deep Creek section of Chesapeake, Virginia;
- m) residence in the Huntersville section of Norfolk, Virginia;
- n) residence in the 400 block of Woodview Drive, Norfolk, Virginia;
- o) residence on Dunbar Street, Norfolk, Virginia;
- p) Foundation Cuts barbershop in Chesapeake, Virginia;
- q) Studios 4 Less, in the 2000 block of Old Greenbrier Road, Chesapeake, Virginia;
- r) Cedar Tree Inn, 721 Conference Center Drive, Chesapeake, Virginia;
- s) Red Roof Inn, 724 Woodlake Drive, Chesapeake, Virginia;
- t) Hampton Inn, 701 Woodlake Drive, Chesapeake, Virginia;
- u) Marriott Hotel, 725 Woodlake Drive, Chesapeake, Virginia.

7. It was further a part of the conspiracy that the defendants and unindicted co-conspirators used telecommunications devices, in particular cellular telephones, to facilitate the day-to-day affairs of the conspiracy, including negotiating the prices for quantities of cocaine, crack cocaine, heroin and other narcotic controlled substances, to arrange for deliveries of such substances, and to further facilitate the commission of felony drug offenses. During the period of the conspiracy, and in furtherance thereof, BRANDON ANTHONY STEPHENS utilized, among other phones, a cellular telephone assigned telephone number (757) \*\*\*-6695 (hereinafter referred to as "Cell Phone #1"); DETRON LASHANNON JACKSON utilized, among other phones, a cellular telephone assigned telephone number (757) \*\*\*-8788 (hereinafter referred to as "Cell Phone #2"); and RONALD GERARD YARBOROUGH utilized, among other phones, a cellular telephone assigned telephone number (619) \*\*\*-7157 (hereinafter referred to as "Cell Phone #3"), and a cellular telephone assigned telephone number (757) \*\*\*-7934 (hereinafter referred to as "Cell Phone #4"). During the course of the conspiracy, various co-conspirators named herein, unindicted co-conspirators, narcotics customers, and others utilized the above-referenced phone numbers to order narcotics, sell narcotics, prepare narcotics for further distribution, and otherwise facilitate narcotics trafficking amongst the members of the conspiracy.

8. It was further a part of the conspiracy that the defendants and unindicted co-conspirators used various methods to conceal the conspiracy and their unlawful drug activities, and to ensure the conspiracy's continuing success, including but not limited to:

- a) possessing and using weapons, including handguns;
- b) causing large sums of cash, the proceeds of illegal narcotics sales, to be stored and hidden at various locations;
- c) concealing large quantities of U.S. currency and narcotics in hidden traps inside vehicles in order to transport both cash and narcotics to and from New York city, Atlanta, Georgia, and other source cities for narcotics;

- d) causing rental apartments, hotel rooms, vehicles, and other assets to be leased or titled in the names of individuals other than the true owner/lessee to disguise the identity of the true owner/lessee and to avoid law enforcement scrutiny; and
- e) creating false or “shell” businesses and corporations in order to create the appearance of legitimate income for funds derived from the sale of illegal narcotics.

### OVERT ACTS

In furtherance of the conspiracy and to accomplish one or more of the purposes thereof, at least one of the following overt acts, among others, was committed in the Eastern District of Virginia and elsewhere:

#### 2009

1. In approximately 2009 the defendants, RONALD GERARD YARBOROUGH, a/k/a “Ron G,” G.R.A.M.S.,” BRANDON ANTHONY STEPHENS, a/k/a “Killa,” DETRON LASHANNON JACKSON, a/k/a “Bae Dollas,” RONALD ANTONIO JOHNSON, a/k/a “Pooh,” DEANGELO RAYDEL HYMAN, a/k/a “Bo,” Safety,” CARLTON ARNELL WILSON, a/k/a “Jug,” AJENE HAMANI JORDAN a/k/a “AJ,” and other individuals began to associate together and identify themselves as the “Cheesetown Money Gettas,” a/k/a “CMG,” a loosely knit neighborhood-based street gang organized primarily for the purpose of drug trafficking and generating illegal income for its members.

2. Beginning in approximately 2009, members of CMG used narcotics proceeds to pay for recording equipment and the rental of a music studio located at 5773 Arrowhead Drive, Suite 109, in Virginia Beach where they stored, cooked and prepared cocaine, crack cocaine and heroin for further distribution. The CMG Studio was also used as a “front” so that CMG members’ could hide their narcotics trafficking activities from law enforcement scrutiny, and also appear to be a legitimate business producing rap music and videos.

3. In May of 2009, CARLTON WILSON distributed 4½ ounces of cocaine to Confidential



Source #14 (hereinafter "CS-14,") twice a week for approximately three weeks.

4. In the summer of 2009, CARLTON WILSON distributed 9 ounces of cocaine to CS-14 twice a week for approximately two weeks.

5. In the summer of 2009, CARLTON WILSON and CS-14 pooled their money and purchased 1 kilogram of cocaine per week for two months from a source of supply in Hampton, Virginia.

6. In July/August 2009, unindicted co-conspirator number 1 (hereinafter, "UCC-1") and unindicted co-conspirator number 2 (hereinafter "UCC-2") offered to sell Confidential Source #8 (hereinafter "CS-8") and unindicted co-conspirator number 3 (hereinafter "UCC-3") kilogram quantities of cocaine for \$30,000 each at the Cambridge Manor Apartments in Chesapeake.

7. In July/August 2009, CS-8 flew to New York City where he and UCC-2 obtained 4 kilograms of cocaine for \$30,000 each in New Jersey and then drove back to Virginia with the cocaine stashed in a hidden compartment of UCC-2's Lincoln Navigator.

8. In July/August 2009, UCC-2 fronted approximately 1 kilogram of cocaine to CS-8 for \$30,000 at the Hampton Inn on Woodlake Drive in Chesapeake. CS-8 and UCC-3 transferred the cocaine to an apartment in Cambridge Manor in Chesapeake where RONALD YARBOROUGH cooked the cocaine into crack cocaine several ounces at a time. CS-8 paid YARBOROUGH \$100 per ounce for that service.

9. In August of 2009, BRANDON STEPHENS, DEANGELO HYMAN and unindicted co-conspirator number 4 (hereinafter "UCC-4") purchased 2 kilograms of cocaine for \$30,000 each from the total amount supplied by UCC-2 who had previously obtained it in New Jersey.

10. In late August 2009, UCC-2 delivered approximately 6 kilograms of cocaine from New Jersey to Virginia and rented a room at the Hampton Inn at 701 Woodlake Drive in Chesapeake where he distributed 3 kilograms of cocaine to CS-8 and UCC-3, and 3 kilograms of cocaine to BRANDON

STEPHENS, DEANGELO HYMAN, and UCC-4 for \$30,000 each.

11. In late August 2009, RONALD YARBOROUGH spent two weeks at CS-8's apartment in Cambridge Manor in Chesapeake cooking 2 kilograms of cocaine into 4 kilograms of crack cocaine for further distribution. CS-8 paid YARBOROUGH \$100 per ounce for the service.

12. During August 2009, RONALD YARBOROUGH purchased 1½ kilograms of crack cocaine (total) from CS-8 for \$1100 per ounce and distributed this crack cocaine to other individuals.

13. In early fall of 2009, UCC-1 and UCC-2 drove to Virginia from New Jersey with approximately 5 kilograms of cocaine and distributed it over the next week to CS-8 and UCC-3 who, in turn distributed it to DEANGELO HYMAN and UCC-4 for \$30,000 per kilogram. During the same time period, CS-8 paid RONALD YARBOROUGH \$100 per ounce to cook 1½ kilograms of cocaine into 3 kilograms of crack cocaine (4 ounces at a time), at a house on Douglas Avenue in the Deep Creek section of Chesapeake.

14. In the fall of 2009, UCC-2 refused to distribute further amounts of cocaine to CMG members because his photo was included in a promotional photo-shoot for a CMG rap album, and UCC-2 was concerned about attracting law enforcement attention.

15. In the summer of 2009, Confidential Source #4 (hereinafter "CS-4") sold 9 ounces of cocaine to RONALD YARBOROUGH for \$9,900 at the Cambridge Apartments in Chesapeake.

16. In the summer of 2009, CS-4 sold 9 ounces of cocaine to RONALD YARBOROUGH for \$9,900 at the Cambridge Apartments in Chesapeake.

17. From the summer of 2009 through approximately May of 2011, RONALD YARBOROUGH purchased 9 ounces of cocaine every three days from CS-4 at the Cambridge Manor Apartments in Chesapeake. On numerous occasions during these transactions RONALD YARBOROUGH was armed with a firearm.

2010

18. In April/May 2010, RONALD YARBOROUGH purchased an AK-47 rifle for \$600, two 9 mm semi-automatic pistols for \$200 each, and a .380 caliber semi-automatic pistol for \$150 from Confidential Source #11 (hereinafter "CS-11") at a residence on Plow Lane in Chesapeake.

19. In the spring of 2010, RONALD YARBOROUGH sold ½ ounce of crack cocaine to CS-11 for \$600 at a residence on Plow Lane in Chesapeake. At the time of the transaction, RONALD YARBOROUGH possessed with intent to distribute approximately 2 ounces of crack cocaine broken down into ¼ ounce and ⅛ ounce quantities for resale.

20. In June of 2010, RONALD YARBOROUGH gave CS-4's phone number to RONALD JOHNSON so that JOHNSON could purchase cocaine from CS-4.

21. In June of 2010, RONALD JOHNSON called CS-4 and arranged to purchase 6 ounces of cocaine for \$6,600 from him; the transaction occurred the same day at an apartment on Fireside Road in Chesapeake.

22. In June of 2010, RONALD JOHNSON ordered 4 to 6 ounces of cocaine for \$1,100 per ounce from CS-4. JOHNSON and CS-4 later met at a location off of Campostella Road in Chesapeake where the transaction took place.

23. From June of 2010 until approximately February of 2011, RONALD JOHNSON purchased 4 to 6 ounces of cocaine for \$1,100 per ounce from CS-4 twice a day. These transactions took place in the MacDonald Manor section of Chesapeake, outside of Military Circle Mall, or at an apartment on Fireside Drive in Chesapeake.

24. In the summer of 2010, while armed with a two-tone Smith and Wesson semi-automatic pistol in his waistband, RONALD YARBOROUGH distributed 1 ounce of cocaine to Confidential Source #3 (hereinafter "CS-3") for \$1,100 at an apartment on Berkeley Avenue in Norfolk, Virginia.

25. In the summer of 2010, RONALD YARBOROUGH distributed 1 ounce of cocaine to CS-3 at an apartment on Berkeley Avenue in Norfolk. The cocaine was stashed in the balcony area of the apartment, next to a firearm.

26. In August of 2010, CS-4 left 9 ounces of cocaine with his girlfriend and instructed her to give it to RONALD YARBOROUGH. Later that day, RONALD YARBOROUGH came to her house in the 3000 block of Fireside Road in Chesapeake, and exchanged \$9,900 for the cocaine.

27. In September/October of 2010 in Chesapeake, RONALD YARBOROUGH told CS-4 he had another out-of-town source of supply for cocaine who had been supplying him with 2 to 3 kilograms three times a month, however the out-of-town source would no longer deal with him because he (YARBOROUGH) owed the source money.

28. On or about December 8, 2010, RONALD JOHNSON and RONALD YARBOROUGH distributed approximately 1 gram of heroin to CS-3 for \$70 in the Farm Fresh parking lot on Providence Road in Chesapeake.

29. On or about December 9, 2010, RONALD JOHNSON and RONALD YARBOROUGH distributed approximately 1 gram of heroin to CS-3 for \$80 on Hemple Street in Chesapeake.

#### 2011

30. At the end of February 2011, RONALD JOHNSON purchased 2 to 3 ounces of cocaine from CS-4 at a residence on Wesleyan Drive in Virginia Beach, Virginia.

31. In May of 2011, RONALD YARBOROUGH purchased 9 ounces of cocaine from CS-4 at the Cambridge Manor Apartments in Chesapeake.

32. In the summer of 2011, RONALD YARBOROUGH and RONALD JOHNSON possessed with intent to distribute 4 ½ ounces of cocaine in the center console of a black Chevy Tahoe while driving in Norfolk.

2012

33. In early 2012, RONALD YARBOROUGH distributed 1 ounce of cocaine to unindicted co-conspirator number 5 (hereinafter "UCC-5") at the CMG music studio in Virginia Beach.

34. In early 2012, RONALD YARBOROUGH distributed 1 ounce of cocaine to UCC-5 at a Food Mart on Border Road in Chesapeake.

35. In the spring of 2012, DETRON JACKSON possessed with intent to distribute 2½ kilograms of cocaine at the Misty Woods Apartments on Jefferson Avenue in Newport News. JACKSON later traded a portion of the cocaine for heroin.

36. In the spring of 2012, DETRON JACKSON distributed ¼ ounce of cocaine to Confidential Source #2 (hereinafter "CS-2") for \$260 and possessed with intent to distribute 2 ounces of cocaine broken down into quarter ounce packages for redistribution.

37. From late spring 2012 to the summer of 2012, DETRON JACKSON distributed ¼ ounce of cocaine to CS-2 every two weeks at the Misty Woods Apartments on Jefferson Avenue in Newport News, Virginia.

38. In the summer of 2012, DETRON JACKSON distributed ¼ ounce of cocaine to CS-2 at the Misty Woods Apartments on Jefferson Avenue in Newport News.

39. In late 2012, DETRON JACKSON distributed ½ ounce of cocaine to CS-7 for \$550 at an apartment near Lee Hall in Portsmouth Virginia.

40. From late 2012 to early spring of 2013, Confidential Source #7 (hereinafter "CS-7") purchased ½ ounce of cocaine every 3 days from DETRON JACKSON at an apartment near Lee Hall in Portsmouth Virginia.

2013

41. In early 2013, RONALD JOHNSON possessed \$10,000 in cash at a hotel in Chesapeake

Virginia which represented the proceeds of the sale of narcotics.

42. From early 2013 until October 2014, Confidential Source #5 (hereinafter "CS-5") purchased at least 1 ounce of crack cocaine per day from RONALD JOHNSON.

43. On or about March 8, 2013, unindicted co-conspirator #7 (hereinafter "UCC-7") distributed approximately .77 grams of crack cocaine for \$80 to Confidential Source #6 (hereinafter "CS-6") at a BP gas station in the 800 block of East Brambleton Avenue in Norfolk.

44. On or about March 15, 2013, UCC-7 distributed approximately 1.8 grams of crack cocaine for \$150 to CS-6 in the Farm Fresh parking lot on Berkeley Avenue in Norfolk.

45. In the spring of 2013, DETRON JACKSON offered to sell  $\frac{1}{8}$  ounce of cocaine to Confidential Source #12 (hereinafter "CS-12") for \$150 at the Aqua Lounge nightclub on Virginia Beach Boulevard in Virginia Beach. CS-12 declined the offer.

46. From the spring of 2013 to early June 2013, CS-7 purchased  $\frac{1}{2}$  ounce of cocaine every three days from DETRON JACKSON, usually meeting him at a Rallies parking lot in Chesapeake, Virginia.

47. In early June 2013, CS-7 and DETRON JACKSON drove to a house on King George Quay in Chesapeake, where JACKSON distributed  $\frac{1}{2}$  ounce of cocaine to CS-7.

48. On or about June 12, 2013, DETRON JACKSON distributed  $\frac{1}{2}$  ounce of cocaine to CS-7 in the Sam's Club the parking lot on Battlefield Boulevard in Chesapeake.

49. In the early summer of 2013, DETRON JACKSON introduced CS-12 to RONALD YARBOROUGH, who offered to sell him  $\frac{1}{8}$  ounce of cocaine for \$200, or  $\frac{1}{4}$  ounce of cocaine for \$350. YARBOROUGH and CS-12 traded phone numbers to facilitate future cocaine deals.

50. In the mid-summer of 2013, RONALD YARBOROUGH distributed  $\frac{1}{8}$  ounce ("eight-ball" or 3.5 grams) of cocaine to CS-12 for \$200 in the parking lot of Eddie's Crabhouse, on Campostella Road in Chesapeake.

51. In the late summer of 2013, RONALD YARBOROUGH distributed ¼ ounce of cocaine to CS-12 for \$400 at CMG's recording studio at 5773 Arrowhead Drive in Virginia Beach.

52. In August of 2013, RONALD YARBOROUGH purchased two black 9 mm semi-automatic pistols and a silver .38 caliber revolver from CS-11 for \$400 (total), at a residence on Flower Lane in Chesapeake.

53. In September of 2013, RONALD YARBOROUGH distributed ½ ounce of crack cocaine to CS-11 for \$600 at a residence on Flower Lane in Chesapeake. At the time of the transaction, RONALD YARBOROUGH possessed with intent to distribute approximately 1 ounce of crack cocaine.

54. From approximately the fall of 2013 to December of 2014, CS-11 purchased ¼ to ½ ounce quantities of crack cocaine from RONALD YARBOROUGH every two to three weeks. The deals occurred at residences on Plow Lane or Flower Lane in Chesapeake, or at the Foundation Park Cuts barbershop in Chesapeake.

55. In mid-November of 2013, DETRON JACKSON distributed 9 ounces of cocaine to Confidential Source #13 (hereinafter "CS-13") for \$15,000 in the parking lot of a 7-Eleven on Brambleton Avenue in Norfolk. Prior to making the exchange, JACKSON assured CS-13 that the cocaine "*could swim*," meaning the quality was good for cooking crack cocaine.

56. In mid-December of 2013, CS-13 and DETRON JACKSON traveled to Atlanta, Georgia and purchased 1 kilogram of cocaine from another source of supply for \$29,500. CS-13 and JACKSON split the cost of the kilogram.

57. In December of 2013, DETRON JACKSON possessed with intent to distribute 2 ounces of cocaine at the CMG music studio in Virginia Beach and sold ⅛ ounce of cocaine from that larger quantity to CS-8 for \$275.

58. In late December of 2013, DETRON JACKSON possessed with intent to distribute 2

ounces of cocaine and ¼ ounce of heroin at the CMG music studio in Virginia Beach, while armed with a semi-automatic firearm.

59. In December of 2013, at the Purple Reign nightclub on Military Highway in Chesapeake, DETRON JACKSON agreed to sell ½ kilogram of cocaine to Confidential Source #16 (hereinafter "CS-16"), but never quoted a price. The deal did not happen because CS-16 knew JACKSON cut his cocaine heavily, which made it poor quality.

60. In December of 2013, Confidential Source #19 (hereinafter "CS-19") was introduced to DETRON JACKSON by a third individual for the purpose of socializing and for potential future cocaine transactions.

61. Approximately three days before Christmas in 2013, CS-13 and DETRON JACKSON traveled to Atlanta, Georgia and purchased 1 kilogram of cocaine from another source of supply for \$29,500. CS-13 and JACKSON split the cost of the kilogram.

62. In December of 2013, BRANDON STEPHENS, RONALD YARBOROUGH, and DEANGELO HYMAN gave CS-8 \$300 cash because he had just been released from prison. At the same time RONALD YARBOROUGH offered to sell CS-8 cocaine at the CMG music studio on Arrowhead Drive in Virginia Beach.

#### 2014

63. Between January and April of 2014, BRANDON STEPHENS, DEANGELO HYMAN, and RONALD YARBOROUGH routinely stored quantities of cocaine, at least four 9 mm firearms and a Mossberg shotgun at the CMG music studio on Arrowhead Lane in Virginia Beach. They also routinely used the facility to cook cocaine into crack cocaine.

64. In January of 2014, RONALD YARBOROUGH distributed ⅛ ounce ("eight-ball" or 3.5 grams) of cocaine to CS-8 for \$200 at the CMG music studio in Virginia Beach.



65. In January/February of 2014, in Portsmouth, CS-16 overheard a telephone conversation between an individual and DETRON JACKSON in which JACKSON agreed to sell the individual two ounces of cocaine.

66. On or about February 23, 2014, RONALD YARBOROUGH, BRANDON STEPHENS and DETRON JACKSON published or caused to be published a video of themselves on YouTube entitled "No Water, No Bake," to promote and advertise their drug trafficking activities, among other things.

67. Between February and March of 2014, BRANDON STEPHENS distributed  $\frac{1}{8}$  to  $\frac{1}{4}$  ounce quantities of cocaine to CS-8 every other day for \$200-\$400 at the CMG music studio in Virginia Beach.

68. In February/March of 2014, DETRON JACKSON offered to sell CS-19 ounces of crack cocaine for \$1300 per ounce, or ounces of powder cocaine for \$1400 per ounce at Tropical Delights nightclub on Indian River Road in Chesapeake and the two exchanged phone numbers.

69. In February/March of 2014, DETRON JACKSON distributed an "eight-ball" (3.5 grams) of crack cocaine and an "eight-ball" of powder cocaine to CS-19 for \$300 at a residence in the 800 block of West 37<sup>th</sup> Street in Norfolk.

70. In February/March of 2014, DETRON JACKSON, while armed with a Glock .40 caliber firearm, and RONALD YARBOROUGH, while armed with a 9mm firearm, distributed 2 ounces of crack cocaine to CS-19 at an apartment in the Grandy Park section of Norfolk.

71. In February/March of 2014, DETRON JACKSON distributed an "eight-ball" (3.5 grams) of crack cocaine to CS-19 in exchange for  $\frac{1}{4}$  ounce of high grade marijuana at an apartment in the Grandy Park Section of Norfolk.

72. In March of 2014, RONALD YARBOROUGH possessed with intent to distribute one ounce of cocaine outside Long Shot Billiards, 1125 South Military Highway in Chesapeake, and distributed  $\frac{1}{4}$  ounce of that quantity to CS-8.

73. In April of 2014, CS-8 and RONALD YARBOROUGH purchased 4½ ounces of cocaine from unindicted co-conspirator #6 (hereinafter “UCC-6”) for \$1,600 per ounce (\$6,400 total), at the Marriott Hotel, 725 Woodlake Drive, Chesapeake.

74. In April of 2014 on at least two occasions, RONALD YARBOROUGH cooked cocaine into crack cocaine and prepared it for further distribution at a residence rented by unindicted co-conspirator #8 (hereinafter “UCC-8”) in the 400 block of Woodview Drive in Norfolk while she was present, with her knowledge and consent.

75. In April of 2014, DETRON JACKSON distributed 2 ounces of crack cocaine to CS-19 for \$2,600 in the parking lot of VA Live nightclub in Chesapeake, Virginia.

76. In April of 2014, DETRON JACKSON possessed with intent to distribute between 4 to 6 ounces of crack cocaine in the parking lot of VA Live nightclub in Chesapeake, Virginia.

77. In April of 2014, DETRON JACKSON distributed 2 ounces of crack cocaine to CS-19 on three additional occasions for \$1,300 per ounce.

78. Between April and August of 2014, on numerous occasions UCC-8 drove RONALD YARBOROUGH to the Hunter Point apartments in Chesapeake so that he could distribute quantities of cocaine and crack cocaine to CS-8.

79. In or about April of 2014, RONALD JOHNSON and DETRON JACKSON rented a house on Dunbar Street in Norfolk and used it in part, as a place to store, cook and prepare cocaine and crack cocaine for further distribution.

80. In April/May of 2014, DETRON JACKSON distributed ⅛ ounce of cocaine to CS-8 for \$275 at a residence in the Huntersville section of Norfolk. At the time, DETRON JACKSON, RONALD JOHNSON and a third individual possessed with intent to distribute approximately 8 ounces of crack cocaine, and were in the process of cooking additional crack cocaine in the apartment.

81. In May of 2014, DETRON JACKSON distributed 2¼ ounces of crack cocaine to CS-19 for \$2,900 at a residence on Tidewater Drive near the Huntersville Recreation Center.

82. In May of 2014, DETRON JACKSON possessed with intent to distribute 4 ounces of crack cocaine at a residence on Tidewater Drive near the Huntersville Recreation Center.

83. In May of 2014, DETRON JACKSON distributed 2 ounces of crack cocaine to CS-19 for \$1,300 per ounce at a residence in the Cary Park section of Norfolk.

84. In May of 2014, DETRON JACKSON distributed 2 ounces of crack cocaine to CS-19 for \$1,300 per ounce at a residence in the Park Place section of Norfolk.

85. Between approximately May and October of 2014, DETRON JACKSON and RONALD JOHNSON purchased 10–15 ounces of cocaine from CARLTON WILSON twice a week for \$1,350–\$1,400 per ounce, cooked it into crack cocaine, and prepared it for further distribution at a house on Dunbar Street in Norfolk.

86. Between April and July of 2014, RONALD YARBOROUGH purchased 2 to 3 ounces of cocaine from CARLTON WILSON for \$1,600 per ounce, and thereafter distributed it to BRANDON STEPHENS, DEANGELO HYMAN, and CS-8 either inside the CMG music studio on Arrowhead Drive in Virginia Beach or at an apartment in the Huntersville section of Norfolk.

87. On or about May 29, 2014, RONALD ANTONIO JOHNSON distributed a quantity of cocaine to unindicted co-conspirator number 10 (hereinafter “UCC-10”) at an apartment in McDonald Manor in Chesapeake where UCC-10 cooked the cocaine into crack cocaine and sold approximately 1.6 grams to CS-15.

88. In June of 2014, DETRON JACKSON distributed 2 ounces of crack cocaine to CS-19 for \$1,300 per ounce at a residence on Goff Street in Norfolk.

89. During June and July 2014, CS-8 purchased 1 ounce of cocaine per week from DETRON

JACKSON for \$1,400 per ounce. These deals occurred primarily at a house in the Huntersville section of Norfolk or a house on King George Quay in Chesapeake.

90. In July of 2014, RONALD JOHNSON and DETRON JACKSON, while armed with a Taurus Judge revolver, distributed ½ ounce of heroin to CS-19 for \$600 plus 1/16<sup>th</sup> ounce of high grade marijuana at a residence on Goff Street in Norfolk.

91. In July of 2014, RONALD JOHNSON and DETRON JACKSON possessed with intent to distributed 3 ounces of heroin at a residence on Goff Street in Norfolk.

92. In July of 2014, DETRON JACKSON distributed 2 ounces of crack cocaine and between ½ and 1 ounce of heroin to CS-19 for \$2,400.

93. In or about late July of 2014, Confidential Source #15 (hereinafter "CS-15") spoke by telephone with unindicted co-conspirator #9 (hereinafter "UCC-9") to set up a purchase of ½ ounce of crack cocaine. During the conversation, UCC-9 assured CS-15 he will get the cocaine from "Pooh" (RONALD JOHNSON) and "Dolla" (DETRON JACKSON). UCC-9 also told CS-15 that "*when he (RONALD JOHNSON) cook 'the giant,' (meaning a large amount of cocaine) he cook the sh\*\*, then weigh it in 8-balls, quarters, halves, and it's already bagged up.*"

94. In August of 2014, DETRON JACKSON distributed 1 ounce of crack cocaine to CS-19 for \$1,300 in the parking lot of the CMG recording studio on Arrowhead Road in Virginia Beach.

95. In August of 2014, DETRON JACKSON possessed with intent to distribute 10 ounces of crack cocaine and a black military-style assault rifle in the trunk of his car in the parking lot of the CMG recording studio on Arrowhead Road in Virginia Beach.

96. In August of 2014, DETRON JACKSON distributed ¼ ounce of cocaine to another individual in a hotel room at Studios 4 Less, in the 2000 block of Old Greenbrier Road in Chesapeake.

97. On or about August 5, 2014, UCC-9 and RONALD JOHNSON distributed approximately

12.1 grams of crack cocaine to CS-15 at a 7-Eleven in the 700 block of Brambleton Avenue in Norfolk.

98. On or about August 6, 2014, RONALD JOHNSON called CS-15 and offered him additional crack cocaine if he needed it.

99. On or about August 13, 2014, RONALD JOHNSON distributed approximately 25.7 grams of crack cocaine to CS-15 in the parking lot of a 7-Eleven in the 700 block of Brambleton Avenue, Norfolk.

100. In or about early August, RONALD YARBOROUGH distributed a quantity of heroin to CS-8 for further distribution.

101. On or about August 14, 2014, CS-8 distributed 3.5 grams of heroin for \$300 to CS-6 at the CMG music studio on Arrowhead Drive in Virginia Beach.

102. In mid-August of 2014, DETRON JACKSON distributed a quantity of cocaine to another individual in a hotel room at Studios 4 Less in the 2000 block of old Greenbrier Road in Chesapeake.

103. In the summer of 2014 on three occasions occurring on a Friday or Saturday night, DETRON JACKSON distributed  $\frac{1}{8}$  ounce or  $\frac{1}{4}$  ounce quantities of cocaine to various customers in his hotel room at either the Studios 4 Less on Old Greenbrier Road or at the Cedar Tree Inn, 721 Conference Center Drive in Chesapeake.

104. On or about August 29, 2014, CS-8 distributed approximately 13.7 grams of fake heroin to CS-6 for \$1,200 in the Hunter's Point Apartments in Chesapeake. While conducting the transaction CS-8 told CS-6 that half of the money paid for the "heroin" was "*going to Ronald Yarborough.*"

105. In September of 2014, DETRON JACKSON traded his BMW 745 and \$9,000 cash which represented the illegal proceeds of narcotics sales, to CS-16 in exchange for CS-16's 760 BMW.

106. In September 2014, DETRON JACKSON introduced CARLTON WILSON to CS-12 at the Mermaid's Club on Potter Road in Virginia Beach for the purpose of facilitating future cocaine deals.

In so doing, JACKSON described WILSON as someone who “*dealt all the weight*” (meaning kilograms of cocaine).

107. In September of 2014, RONALD YARBOROUGH purchased an AR-15 with a military scope for \$600, a Springfield 9XD rifle, and a third firearm for approximately \$250 each from CS-11 at a residence on Flower Lane in Chesapeake.

108. On or about September 5, 2014, BRANDON STEPHENS distributed approximately 16 grams of crack cocaine to CS-6 for \$1,400 at a Hardee’s restaurant on Bainbridge Boulevard and Freeman Avenue in Chesapeake.

109. On or about September 23, 2014, BRANDON STEPHENS distributed approximately 20.6 grams of crack cocaine for \$1,500 to CS-6 at the CMG music studio in Virginia Beach.

110. In or about September of 2014, RONALD YARBOROUGH distributed a quantity of heroin to CS-8 for further distribution.

111. On or about September 24, 2014, CS-8 distributed approximately 10.7 grams of heroin to CS-6 for \$1,150 at the Hunter Point Apartments in Chesapeake Virginia.

112. On or about September 30, 2014, BRANDON STEPHENS distributed approximately 26.8 grams of crack cocaine and 14.2 grams of crack cocaine to CS-6 on Linster Road in Chesapeake.

113. Between August and December of 2014, RONALD YARBOROUGH purchased 4 ounces of cocaine once a week from CARLTON WILSON and redistributed it in part to BRANDON STEPHENS, DEANGELO HYMAN, and CS-8 at the CMG music studio in Virginia Beach or at the Red Roof Inn on Woodlake Drive in Chesapeake.

114. Between June and December of 2014, CS-8 purchased 1 ounce of cocaine per week from RONALD JOHNSON or DETRON JACKSON at a house on King George Quay in Chesapeake. If JOHNSON wasn’t available, he would direct CS-8 to call JACKSON, and vice versa. On each

occasion, JACKSON was armed with a .45 caliber firearm and JOHNSON was armed with a 9 mm firearm.

115. In October of 2014, at VA Live nightclub on South Military Highway in Chesapeake, CARLTON WILSON offered to sell 1 ounce of cocaine to CS-12 for \$1,400.

116. In October of 2014, CS-8 purchased 1 ounce of cocaine for \$1,400 from DETRON JACKSON at a house on King George Quay in Chesapeake. While the transaction was taking place, RONALD JOHNSON was in the process of cooking crack cocaine.

117. In October of 2014, RONALD JOHNSON cooked powder cocaine into crack cocaine at a house on King George Quay in Chesapeake.

118. In October of 2014, DETRON JACKSON and RONALD JOHNSON possessed with intent to distribute approximately 4 ounces of cocaine and 1 ounce of heroin.

119. In November/December 2014, CARLTON WILSON distributed 2 ounces of cocaine to CS-12 for \$2,800 at a house on King George Quay in Chesapeake.

120. In November/December 2014, CARLTON WILSON distributed 2 ounces of cocaine to CS-12 for \$2,800 at a Taco Bell parking lot on the corner of South Military Highway and Greenbrier Parkway in Chesapeake.

121. Between November 2014 and February 2015, RONALD YARBOROUGH and AJENE JORDAN distributed ¼ ounce of crack cocaine to CS-9 and another individual on three occasions in the South Norfolk section of Chesapeake, and on one occasion at the CMG music studio in Virginia Beach.

122. In the last week of November 2014, RONALD YARBOROUGH purchased 4 ounces of cocaine from CARLTON WILSON.

123. In the last week of November, RONALD YARBOROUGH distributed three ounces of cocaine to BRANDON STEPHENS, DEANGELO HYMAN, and CS-8 at the Red Roof Inn on

Woodlake Drive in Chesapeake.

124. On or about December 2, 2014, RONALD YARBOROUGH distributed 1 ounce of cocaine each to BRANDON STEPHENS and CS-8 at the Red Roof Inn on Woodlake Drive in Chesapeake for \$1,400 per ounce.

125. On or about December 2, 2014, BRANDON STEPHENS distributed approximately 24.2 grams of crack cocaine for \$1,550 to CS-6 at the Cedar Tree hotel on Conference Drive in Chesapeake.

126. On or about December 3, 2014, CARLTON WILSON distributed 2 ounces of cocaine to RONALD YARBOROUGH in the parking lot of Q-Masters Billiards, 5612 East Princess Anne Boulevard in Virginia Beach.

127. On December 11, 2014, RONALD YARBOROUGH distributed approximately 2.3 grams of cocaine to CS-11 at the Foundation Park Cuts barbershop in Chesapeake.

#### 2015

128. On or about February 6, 2015, BRANDON STEPHENS distributed approximately 25.3 grams of cocaine for \$1,600 to CS-6 at a residence in the 1000 block of Hill Street in Chesapeake.

129. On or about February 12, 2015, DETRON JACKSON distributed approximately 13.8 grams of cocaine for \$550 to CS-7 at a cul-de-sac on King George Quay in Chesapeake.

130. On or about March 10, 2015, BRANDON STEPHENS distributed approximately 20.2 grams of crack cocaine to CS-6 at a residence in the 1000 block of Hill Street in Chesapeake.

131. On or about March 11, 2015, DETRON JACKSON attempted to distribute ½ ounce of cocaine to CS-7 but was unsuccessful.

132. On or about April 14, 2015, at approximately 5:37 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with “JB” to discuss the sale of ¼ ounce of cocaine. (Call Session #37).

133. On or about April 14, 2015, between approximately 11:26 p.m. and 11:48 p.m.,



BRANDON STEPHENS used Cell Phone #1 to exchange text messages with "MS" to discuss and facilitate the sale of \$40 worth of crack cocaine. (Call Session #83-90).

134. On or about April 15, 2015, at approximately 12:17 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with "MM" to discuss and facilitate the sale of 1/8 ounce of cocaine for \$200. (Call Session #108).

135. On or about April 15, 2015, at approximately 7:33 p.m., DETRON JACKSON used Cell Phone #2 to speak with CS-12 to discuss the sale of an ounce of cocaine and how much money CS-12 could make if he cooked it into crack cocaine. (Call Session #77).

136. On or about April 17, 2015, at approximately 11:18 a.m., BRANDON STEPHENS used Cell Phone #1 to speak with an individual to discuss cutting agents, as well as the source, quality and price of a kilogram of cocaine. (Call Session #553).

137. On or about April 18, 2015, between approximately 1:34 p.m. and 1:45 p.m., DETRON JACKSON used Cell Phone #2 to speak with RONALD JOHNSON about where JOHNSON had stashed an amount of cocaine. (Call Session #451, 453).

138. On or about April 18, 2015, at approximately 11:21 p.m., DETRON JACKSON used Cell Phone #2 to speak with "CP" to discuss the sale of an ounce of cocaine. During the conversation, "CP" tells JACKSON that he prefers "*the solid*," meaning crack cocaine. (Call Session #519).

139. On or about April 19, 2015, at approximately 4:41 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with an individual to discuss and facilitate the sale of \$70 worth of crack cocaine. (Call Session #983).

140. On or about April 21, 2015, at approximately 7:16 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with an individual about the sale of either a half-ounce or an ounce of cocaine. (Call Session #1262).

141. On or about April 21, 2015, between approximately 7:52 p.m. and 8:34 p.m., BRANDON STEPHENS used Cell Phone #1 to exchange several text messages with CS-6 regarding the sale of one ounce of crack cocaine to CS-6 planned for the following day.

142. On or about April 21, 2015, at approximately 9:09 p.m., DETRON JACKSON used Cell Phone #2 to speak with an individual to discuss whether he wants to purchase ½ ounce of cocaine “*that swim[s]*,” (meaning crack cocaine) or “*that’s straight for the nose*” (meaning powder cocaine). (Call Session #955).

143. On or about April 21, 2015, at approximately 9:25 p.m., DETRON JACKSON used Cell Phone #2 to speak with “CP” to discuss the sale of \$250 worth of cocaine. Between 9:48 p.m. and 10:25 p.m., JACKSON exchanged a series of text messages with “CP” instructing him to come to an apartment in the 1300 block of MacDonald Manor to conduct the transaction. (Call Session #961, 964-966, 968, 975-978).

144. On or about April 22, 2015, at approximately 11:17 a.m., BRANDON STEPHENS used Cell Phone #1 to speak with RONALD YARBOROUGH using Cell Phone #3 to discuss and facilitate the sale of one ounce of crack cocaine. Specifically, STEPHENS tries to negotiate the price down to \$900 by telling YARBOROUGH he can only re-sell it for “*a stack*” (street term for \$1,000) meaning he will only make \$100 profit. YARBOROUGH agrees to sell it to STEPHENS for \$950. (Call Session #1359).

145. On or about April 22, 2015, at approximately 2:46 p.m., DETRON JACKSON used Cell Phone #2 to speak with an individual to discuss the sale of ¼ ounce of cocaine for \$270 and how to maximize profit when cooking it into crack cocaine. (Call Session #1106).

146. On or about April 22, 2015, between approximately 3:20 p.m. and 4:42 p.m., BRANDON STEPHENS used Cell Phone #1 to exchange several text messages with CS-6 regarding the sale of one

ounce of crack cocaine for \$1600. (Call Session #1398, 1399, 1407, 1408, 1410, 1411, 1413, 1419, 1420, 1432.)

147. On or about April 22, 2105, at approximately 3:22 p.m. and 3:33 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with RONALD YARBOROUGH on Cell Phone #3 to let him (YARBOROUGH) know that his customer (CS-6) would be ready to purchase 1 ounce of crack cocaine shortly. (Call Session #1400, 1405).

148. On or about April 22, 2015, at approximately 4:29 p.m., UCC-8 drove RONALD YARBOROUGH to BRANDON STEPHENS' residence in the 1000 block of Hill Street in Chesapeake, where YARBOROUGH delivered approximately one ounce of crack cocaine to STEPHENS. (Call Session #1422).

149. On or about April 22, 2015, at approximately 4:45 p.m., BRANDON STEPHENS distributed approximately 12.6 grams of crack cocaine to CS-6 for \$1,600 at STEPHENS' residence in the 1000 block of Hill Street in Chesapeake.

150. On or about April 22, 2015, at approximately 4:53 p.m., BRANDON STEPHENS using Cell Phone #1 called RONALD YARBOROUGH using Cell Phone #3 to tell him "*I'm ready for you bro,*" meaning CS-6 had left. At approximately 5:01 p.m., YARBOROUGH met with STEPHENS in the 1000 block of Hill Street in Chesapeake, to receive payment for the ounce of crack cocaine recently distributed to CS-6. (Call Session #1438, 1440).

151. On or about April 25, 2015, at approximately 3:57 p.m., DETRON JACKSON used Cell Phone #2 to arrange for an individual to pick up cocaine from RONALD JOHNSON. (Call Session #1516).

152. On or about April 26, 2015, at approximately 7:26 p.m., DETRON JACKSON used Cell Phone #2 to speak with an individual who asked JACKSON to give him some cocaine to sell because he

needed help; JACKSON agreed to help him once RONALD JOHNSON returns. (Call Session #1650).

153. On or about April 26, 2015, at approximately 11:39 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with "MB" to discuss and facilitate the sale of  $\frac{1}{8}$  ounce of cocaine. (Call Session #2074).

154. On or about April 27, 2015, at approximately 6:39 p.m., DETRON JACKSON used Cell Phone #2 to speak with RONALD JOHNSON; during the conversation JACKSON tells JOHNSON that he has a "*couple of zips*," meaning two ounces of cocaine. (Call Session #1805).

155. On or about April 27, 2015, at approximately 8:35 p.m., DETRON JACKSON used Cell Phone #2 to ask RONALD JOHNSON to call "A" to see if JACKSON can use her residence to "*bag up*" additional amounts of cocaine for distribution. (Call Session #1827).

156. On or about April 28, 2015, at approximately 2:01 p.m., DETRON JACKSON used Cell Phone #2 to speak with an individual to discuss and facilitate the sale  $\frac{1}{2}$  ounce of cocaine for \$700. During the conversation, JACKSON assured the individual the cocaine was "*official*" (meaning high quality) and assured him he could cook the  $\frac{1}{2}$  ounce into a "*zip*" (one ounce) of crack cocaine. (Call Session #1904).

157. On or about April 29, 2015, at approximately 12:55 a.m., DETRON JACKSON used Cell Phone #2 to speak with an individual to discuss and facilitate the sale 3 ounces of cocaine at an apartment in the 1300 block of MacDonald Manor in Chesapeake. (Call Session #1987).

158. On or about April 30, 2015, at approximately 2:29 p.m., DETRON JACKSON used Cell Phone #2 to speak with an individual to discuss putting their money together to purchase a kilogram of cocaine for \$34,000. (Call Session #2172).

159. On or about May 1, 2015, at approximately 2:03 p.m., BRANDON STEPHENS used Cell Phone #1 to call DETRON JACKSON using Cell Phone #2 to see if JACKSON knew anyone they could

purchase cocaine from as they were both low on supply. (Call Session #2345).

160. On or about May 1, 2015, at approximately 2:05 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with an individual to discuss and facilitate the sale of 1/8 ounce of cocaine. (Call Session #2800).

161. On or about May 2, 2015, at approximately 11:33 a.m., BRANDON STEPHENS used Cell Phone #1 to speak with RONALD YARBOROUGH using Cell Phone #3 to discuss and facilitate the sale of 1/4 ounce of cocaine. (Call Session #2947).

162. On or about May 2, 2015, at approximately 6:11 p.m., DETRON JACKSON used Cell Phone #2 to speak with "Black" to discuss purchasing 5 to 6 ounces of cocaine for \$1,400 per ounce. (Call Session #2633).

163. On or about May 2, 2015, at approximately 7:20 p.m., DETRON JACKSON used Cell Phone #2 to speak with an individual who was waiting to purchase cocaine, to tell him, "*I ain't gonna be ready until round about 9. I'm about to pick it up now.*" (Call Session #2645).

164. On or about May 2, 2015, at approximately 8:00 p.m., DETRON JACKSON possessed with intent to distribute approximately 5 ounces of cocaine on Paul Jones Street in Portsmouth.

165. On or about May 3, 2015, between approximately 1:16 and 1:22 a.m., BRANDON STEPHENS used Cell Phone #1 to speak with "MS" to discuss selling \$40 worth of crack cocaine to her; during the conversations, "MS" warned STEPHENS about the presence of police officers near a Burger King on Battlefield Boulevard in Chesapeake, and they changed the place they intended to meet to avoid law enforcement scrutiny. (Call Session #3151, 3152, 3153).

166. On or about May 3, 2015, in a series of phones calls between approximately 1:42 p.m. and 4:31 p.m., DETRON JACKSON used Cell Phone #2 to speak with "Black" to discuss purchasing 6 ounces of cocaine from him. During the conversation JACKSON told "Black," "*I'm in the lab man...*"

and they discussed using "*inositol*" as a cutting agent. (Call Sessions #2818, 2825, and 2826).

167. On or about May 4, 2015, at approximately 4:20 p.m., DETRON JACKSON used Cell Phone #2 to speak with "Black" to discuss purchasing 4 or 5 ounces of cocaine. (Call Session #3010).

168. On or about May 5, 2015, at approximately 9:36 p.m., DETRON JACKSON used Cell Phone #2 to speak with an individual who wanted to purchase a "*skate*" ( $\frac{1}{8}$  ounce of cocaine) for \$125. (Call Session #3255).

169. On or about May 5, 2015, at approximately 11:26 p.m., "DC" called BRANDON STEPHENS on Cell Phone #1 to ask STEPHENS to find a firearm for him because someone shot at him earlier. (Call Session #3430).

170. On or about May 6, 2015, at approximately 1:20 p.m., DETRON JACKSON used Cell Phone #2 to speak with "Black" to discuss purchasing 9 ounces of cocaine, however, "Black" only had  $3\frac{1}{2}$  ounces; during the conversation "Black" and JACKSON also discussed driving to New Jersey to obtain additional cocaine. (Call Session #3362).

171. On or about May 6, 2015, at approximately 3:42 p.m. and 9:30 p.m., DETRON JACKSON used Cell Phone #2 to speak with "Black" to discuss purchasing a quantity of cocaine, and whether JACKSON wants it in powder form or "*already done*," i.e., in "crack" form. (Call Session #3406, 3510).

172. On or about May 9, 2015, at approximately 5:35 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with "MM" to discuss and facilitate the sale of \$40 worth of cocaine for himself and \$50 worth for another person. (Call Session #4060).

173. On or about May 16, 2015, at approximately 4:45 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with an individual to discuss and facilitate the distribution of  $1\frac{1}{2}$  ounces of cocaine for \$1250. (Call Session #221).

174. On or about May 16, 2015, at approximately 9:57 p.m., BRANDON STEPHENS used

Cell Phone #1 to speak with "LB" to discuss a potential new supplier of cocaine, the price, and quality of his product. (Call Session #4862).

175. On or about May 17, 2015, in a series of calls between approximately 12:40 p.m. and 5:30 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with RONALD JOHNSON, DEANGELO HYMAN, and "Tight" to discuss and facilitate the purchase of 4 ounces of cocaine from "Tight." (Call Session #425, 427- 431, 434, 437, 474, 489, 512, 519, 526, 531, 534, 535, 548, 552, 553).

176. On or about May 17, 2015, RONALD YARBOROUGH and DEANGELO HYMAN possessed with intent to distribute approximately 4 ounces of cocaine in the parking lot of a buffet restaurant at Greenbrier Parkway and Military Highway in Chesapeake.

177. On or about May 18, 2015, in a series of calls between approximately 5:22 p.m. and 7:30 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with DEANGELO HYMAN to discuss and facilitate the delivery of a quantity of cocaine to the CMG recording studio on Arrowhead Drive in Virginia Beach. During the conversations, YARBOROUGH and HYMAN discussed where they would cook the cocaine into crack cocaine, and what utensils they needed. (Call Session #748, #764, #767, #770).

178. On or about May 19, 2015, at approximately 4:58 p.m. and 5:07 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with an individual to discuss and facilitate the sale of ½ ounce of cocaine for \$750. (Call Session #5372, 5374).

179. On or about May 19, 2015, at approximately 7:25 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with AJENE JORDAN to discuss and facilitate the sale of one ounce of cocaine. During the conversation YARBOROUGH asks JORDAN, "*What do you want . . . a one?*" meaning one ounce of cocaine. JORDAN replies, "*Yeah, that's the easiest...yeah.*" YARBOROUGH agrees and tells JORDAN he is heading "*back to the office,*" (meaning the CMG music studio) to "*grab it right quick.*"

(Call Session #1135).

180. On or about May 20, 2015, at approximately 2:18 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with RONALD JOHNSON to discuss cooking one ounce of cocaine into crack cocaine. (Call Session #1292).

181. On or about May 21, 2015, at approximately 3:53 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with an individual to discuss and facilitate the distribution of a quantity of crack cocaine. At 3:57 p.m., the individual sent a text message to YARBOROUGH telling him that he needed the crack cocaine to be “dry” (not wet, or recently cooked) so that he could distribute it quicker. (Call Session #1583, #1585-1586).

182. On or about May 26, 2015, at approximately 2:26 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with “RP” to discuss a possible shipment of cocaine from New York, and to express concern about the quality of the cocaine because the price is so low. (Call Session #6353).

183. On or about May 27, 2015, at approximately 1:05 p.m. and 1:27 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with “Tight” on two occasions to discuss and facilitate the sale of 4 ounces of cocaine. During the conversation, and in order to assure YARBOROUGH that the cocaine was of good quality, “Tight” told YARBOROUGH, “...*this sh\*\* here, she crystaled up all the way through....*” (Call Session #3176, 3179).

184. On or about May 27, 2015, at approximately 7:48 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with “Tight” to discuss and facilitate the sale of 4 ounces of crack cocaine. During the conversation “Tight” told YARBOROUGH that he would be ready to meet him at 8:30 p.m. that evening. (Call Session #3227).

185. On or about May 27, 2015, between approximately 8:40 p.m. and 10:08 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with RONALD JOHNSON in a series of phone calls to



discuss the delivery of 4 ounces of cocaine from their source of supply. (Call Session #3240, 3243, 3247, 3255, 3260).

186. On or about May 29, 2015, at approximately 1:34 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with AJENE JORDAN to discuss and facilitate the sale of 3 ounces of cocaine. During the conversation JORDAN asks YARBOROUGH, "*Hey look, what are you going to do for the half and the cutie?*" meaning one half and one quarter ounce of cocaine. YARBOROUGH replies, "\$825." They negotiate, and YARBOROUGH ends by agreeing, "*That's yeah, you 3 zips, alright.*" (Call Session #3603).

187. On or about May 29, 2015, at approximately 8:09 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with an individual and tell him that he (YARBOROUGH) believed they were surveilled during a narcotics transaction that occurred earlier. YARBOROUGH and the individual also discussed discarding their cell phones and getting new phones due to the incident. (Call Session #3765).

188. On or about May 30, 2015, at approximately 11:41 a.m., RONALD YARBOROUGH used Cell Phone #3 to tell RONALD JOHNSON that he is going to purchase a new cell phone. (Call Session #3888).

189. On or about May 30, 2015, RONALD YARBOROUGH obtained a new cell phone (Cell Phone #4), and significantly decreased his use of Cell Phone #3.

190. On or about May 30, 2015, at approximately 12:29 a.m., BRANDON STEPHENS used Cell Phone #1 to speak with "MB" to discuss and facilitate the sale of \$80 worth of cocaine. (Call Session #6751).

191. On or about May 30, 2015, at approximately 3:18 p.m., RONALD YARBOROUGH used Cell Phone #4 to send BRANDON STEPHENS a text message on Cell Phone #1 to alert STEPHENS to YARBOROUGH's new phone number. (Call Session # 6816).

192. On or about May 30, 2015, at approximately 7:38 p.m., RONALD YARBOROUGH used Cell Phone #3 to speak with an individual who is looking for crack cocaine, but YARBOROUGH tells the individual he is out, and also reminds the individual to call on the new phone number (Cell Phone #4). (Call Session #3988).

193. In June 2015, RONALD YARBOROUGH and AJENE JORDAN distributed  $\frac{1}{4}$  ounce of crack cocaine for \$380 to CS-9 and another individual at the CMG music studio in Virginia Beach.

194. On or about June 4, 2015, at approximately 1:28 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with "DC" to discuss and facilitate the sale of a "*pool shot*," ( $\frac{1}{8}$  ounce) of cocaine. During the conversation STEPHENS asked "DC" to let him know "*which way*" he wanted it (meaning crack or powder). (Call Session #7290).

195. On or about June 5, 2015, at approximately 1:56 p.m., RONALD YARBOROUGH while using Cell Phone #3, complained about someone moving his firearm from one place to another. (Call Session # 4647).

196. On or about June 5, 2015, at approximately 2:45 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with "SJ" to discuss and facilitate the sale of \$100 worth of cocaine. (Call Session #7470).

197. On or about June 8, 2015, at approximately 6:06 p.m., BRANDON STEPHENS used Cell Phone #1 to speak with "MS" to discuss and facilitate the sale of \$40 worth of crack cocaine. (Call Session #7781).

198. On or about June 9, 2015, at approximately 3:33 p.m., RONALD YARBOROUGH used Cell Phone #4 to speak with BRANDON STEPHENS using Cell Phone #1 to discuss and facilitate YARBOROUGH selling  $\frac{1}{2}$  ounce of crack cocaine to STEPHENS for \$450. (Call Session #7807).

199. In July 2015, RONALD YARBOROUGH traveled to Tennessee by car to obtain cocaine which was intended for further distribution in Virginia.

200. In the summer of 2015, Confidential Source #18 purchased 5 ounces of cocaine from CARLTON WILSON in the parking lot of TGI Friday's restaurant on Volvo Parkway in Chesapeake.

201. In the summer of 2015, CS-18 purchased 9 ounces of cocaine from CARLTON WILSON in the parking lot of TGI Friday's restaurant on Volvo Parkway in Chesapeake.

202. From October through December of 2015, RONALD YARBOROUGH, RONALD JOHNSON and another individual combined their money to purchase 2 to 5 ounces of cocaine per week from CARLTON WILSON, then cooked it into crack cocaine and prepared it for further distribution at an apartment in the 1800 block of Sparrow Road in Chesapeake.

203. On November 5, 2015, AJENE JORDAN distributed ¼ ounce of cocaine to CS-9 for \$400 at Scandals nightclub in Virginia Beach.

204. On or about December 4, 2015, RONALD JOHNSON possessed with intent to distribute approximately 51.91 grams of cocaine base, 13.53 grams of cocaine, and 62 prescription pills, along with digital scales, baggies, razor blades and other paraphernalia consistent with cocaine distribution at a residence in the 1800 block of Sparrow Road in Chesapeake.

205. On or about December 4, 2015, RONALD JOHNSON possessed a Ruger 9mm semi-automatic pistol in his silver Lexus which was parked outside an apartment in the 1800 block of Sparrow Road in Chesapeake.

206. In or about December of 2015, CARLTON WILSON drove a 2010 Porsche Panamera, VIN #WP0AB2A77AL062159 registered to Tarsha L. Williams to deliver a quantity of cocaine to RONALD JOHNSON at MacDonald Manor in Chesapeake.

207. On January 14, 2016, AJENE JORDAN distributed approximately 6.3 grams of cocaine to CS-9 for \$400 outside the Sidelines Sports Bar on Holland Road in Virginia Beach.

(All in violation of Title 21, United States Code, Section 846).

COUNT TWO

In or about the spring of 2012, at Newport News, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a/ "Bae Dollas," did unlawfully, knowingly and intentionally distribute approximately one-quarter ( $\frac{1}{4}$ ) ounce of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT THREE

In or about late 2012, at Portsmouth, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a/ "Bae Dollas," did unlawfully, knowingly and intentionally distribute approximately one-half ( $\frac{1}{2}$ ) ounce of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT FOUR

In or about the summer of 2013, at Virginia Beach, in the Eastern District of Virginia, the defendant, RONALD GERARD YARBOROUGH, a/k/a/ "Ron G," "G.R.A.M.S.," did unlawfully, knowingly and intentionally distribute approximately one-quarter ( $\frac{1}{4}$ ) ounce of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT FIVE

In or about December of 2013, at Virginia Beach, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a/ "Bae Dollas," did unlawfully, knowingly and intentionally possess with intent to distribute approximately 2 ounces of a mixture and substance

containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT SIX

In or about December of 2013, at Virginia Beach, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a/ "Bae Dollas," did unlawfully, knowingly and intentionally possess with intent to distribute approximately one-quarter ( $\frac{1}{4}$ ) ounce of heroin, a Schedule I narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT SEVEN

In or about early spring of 2014, at Virginia Beach, in the Eastern District of Virginia, the defendants, RONALD GERARD YARBOROUGH, a/k/a "Ron G," "G.R.A.M.S," BRANDON ANTHONY STEPHENS, a/k/a "Killa," and DEANGELO RAYDEL HYMAN, a/k/a "Bogart" or "Safety," did knowingly and unlawfully possess firearms, to wit: four 9 mm semi-automatic pistols and a Mossberg style shotgun, in furtherance of a drug trafficking crime, that is, the drug trafficking crime described and set forth in Count One of this indictment which is incorporated by reference herein, and which crime constitutes an offense for which the defendants may be prosecuted in a court of the United States.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.)

COUNT EIGHT

In or about February/March of 2014, at Norfolk, in the Eastern District of Virginia, the defendants, RONALD GERARD YARBOROUGH, a/k/a "Ron G," "G.R.A.M.S," and DETRON LASHANNON JACKSON, a/k/a "Bae Dollas," did unlawfully, knowingly and intentionally possess twenty-eight (28) grams or more, that is, approximately 2 ounces, of a mixture and substance

containing a detectable amount of cocaine base, commonly known as “crack cocaine,” a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B)(iii) and Title 18, United States Code, Section 2.)

COUNT NINE

In or about February/March of 2014, at Norfolk, in the Eastern District of Virginia, the defendants, RONALD GERARD YARBOROUGH, a/k/a “Ron G” “G.R.A.M.S,” and DETRON LASHANNON JACKSON, a/k/a “Bae Dollas” did knowingly and unlawfully possess firearms, to wit: a Glock .40 caliber semi-automatic pistol and a chrome 9 mm semi-automatic pistol, in furtherance of a drug trafficking crime, that is, the drug trafficking crime described and set forth in Count One and Count Eight of this indictment which are incorporated by reference herein, and which crimes constitute offenses for which the defendants may be prosecuted in a court of the United States.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.)

COUNT TEN

In or about May of 2014, at Norfolk, in the Eastern District of Virginia, the defendant, CARLTON ARNELL WILSON, a/k/a “Jug,” did unlawfully, knowingly and intentionally distribute approximately 10 ounces of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT ELEVEN

In or about May of 2014, at Norfolk, in the Eastern District of Virginia, the defendants, RONALD ANTONIO JOHNSON, a/k/a/ “Pooh,” and DETRON LASHANNON JACKSON, a/k/a

“Bae Dollas,” did unlawfully, knowingly and intentionally possess with intent to distribute approximately 10 ounces of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) and Title 18, United States Code, Section 2.)

COUNT TWELVE

In or about May of 2014, at Norfolk, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a “Bae Dollas,” did unlawfully, knowingly and intentionally possess with intent to distribute twenty-eight (28) grams or more, that is, approximately 6 ounces, of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).)

COUNT THIRTEEN

In or about July of 2014, at Norfolk, in the Eastern District of Virginia, the defendants, DETRON LASHANNON JACKSON, a/k/a “Bae Dollas,” and RONALD ANTONIO JOHNSON, a/k/a “Pooh,” did unlawfully, knowingly and intentionally possess with intent to distribute approximately 3 ounces of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) and Title 18, United States Code, Section 2.)

COUNT FOURTEEN

In or about July of 2014, at Norfolk, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a “Bae Dollas,” did knowingly and unlawfully possess a

firearm, to wit: a Taurus Judge revolver, in furtherance of a drug trafficking crime, that is, the drug trafficking crimes described and set forth in Counts One and Count Thirteen of this indictment, which are incorporated by reference herein, and which crimes constitute offenses for which the defendant may be prosecuted in a court of the United States.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT FIFTEEN

In or about August of 2014, at Virginia Beach, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a “Bae Dollas,” did unlawfully, knowingly and intentionally possess with intent to distribute twenty-eight (28) grams or more, that is, approximately 10 ounces of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).)

COUNT SIXTEEN

On or about August 5, 2014, at Norfolk, in the Eastern District of Virginia, the defendant, RONALD ANTONIO JOHNSON, a/k/a “Pooh,” did unlawfully, knowingly and intentionally distribute approximately 12.1 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C)  
and Title 18, United States Code, Section 2.)

COUNT SEVENTEEN

On or about August 13, 2014, at Norfolk, in the Eastern District of Virginia, the defendant, RONALD ANTONIO JOHNSON, a/k/a/ “Pooh,” did unlawfully, knowingly and intentionally



distribute approximately 25.7 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) and Title 18, United States Code, Section 2).

COUNT EIGHTEEN

In or about August/September of 2014, at Chesapeake, in the Eastern District of Virginia, the defendant, RONALD GERARD YARBOROUGH, a/k/a “Ron G,” “G.R.A.M.S,” did unlawfully, knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT NINETEEN

In or about September of 2014, at Norfolk, in the Eastern District of Virginia, the defendant, CARLTON ARNELL WILSON, a/k/a “Jug,” did unlawfully, knowingly and intentionally distribute approximately 10 ounces of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY

In or about September of 2014, at Norfolk, in the Eastern District of Virginia, the defendants, RONALD ANTONIO JOHNSON, a/k/a/ “Pooh,” and DETRON LASHANNON JACKSON, a/k/a “Bae Dollas,” did unlawfully, knowingly and intentionally possess with intent to distribute approximately 10 ounces of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) and Title 18, United States Code, Section 2.)

COUNT TWENTY-ONE

On or about September 5, 2014, at Chesapeake, in the Eastern District of Virginia, the defendant, BRANDON ANTHONY STEPHENS, a/k/a "Killa," did unlawfully, knowingly and intentionally distribute approximately 16 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine," a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY-TWO

On or about September 23, 2014, at Virginia Beach, in the Eastern District of Virginia, the defendant, BRANDON ANTHONY STEPHENS, a/k/a "Killa," did unlawfully, knowingly and intentionally distribute approximately 20.6 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine," a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY-THREE

On or about September 30, 2014, at Chesapeake, in the Eastern District of Virginia, the defendant, BRANDON ANTHONY STEPHENS, a/k/a "Killa," did unlawfully, knowingly and intentionally distribute twenty-eight (28) grams or more, that is, approximately 41 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine," a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).)

COUNT TWENTY-FOUR

On or about December 2, 2014, at Chesapeake, in the Eastern District of Virginia, the defendant, BRANDON ANTHONY STEPHENS, a/k/a "Killa," did unlawfully, knowingly and intentionally distribute approximately 24.2 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine," a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY-FIVE

On or about December 2, 2014, at Chesapeake, in the Eastern District of Virginia, the defendant, RONALD GERARD YARBOROUGH, a/k/a/ "Ron G," "G.R.A.M.S.," did unlawfully, knowingly and intentionally distribute approximately one ounce of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY-SIX

On or about December 11, 2014, at Chesapeake, in the Eastern District of Virginia, the defendant, RONALD GERARD YARBOROUGH, a/k/a/ "Ron G" or "G.R.A.M.S.," did unlawfully, knowingly and intentionally distribute approximately 2.3 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY-SEVEN

On or about February 6, 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, BRANDON ANTHONY STEPHENS, a/k/a "Killa," did unlawfully, knowingly and intentionally

distribute approximately 25.3 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY-EIGHT

On or about February 12, 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a "Bae Dollas," did unlawfully, knowingly and intentionally distribute approximately 13.8 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT TWENTY-NINE

On or about March 10, 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, BRANDON ANTHONY STEPHENS, a/k/a "Killa," did unlawfully, knowingly and intentionally distribute approximately 20.2 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine," a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT THIRTY

On or about April 22, 2015, at Chesapeake, in the Eastern District of Virginia, the defendants, BRANDON ANTHONY STEPHENS, a/k/a "Killa," and RONALD GERARD YARBOROUGH, a/k/a "Ron G," "G.R.A.M.S." did unlawfully, knowingly and intentionally distribute approximately 12.6 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine," a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) and Title 18 United States Code Section 2.)

COUNT THIRTY-ONE

On or about May 2, 2015, at Portsmouth, in the Eastern District of Virginia, the defendant, DETRON LASHANNON JACKSON, a/k/a "Bae Dollas" did unlawfully, knowingly and intentionally possess with intent to distribute approximately 5 ounces of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT THIRTY-TWO

On or about May 17, 2015, at Chesapeake, in the Eastern District of Virginia, the defendants, RONALD GERARD YARBOROUGH, a/k/a "Ron G," "G.R.A.M.S." and DEANGELO RAYDEL HYMAN, a/k/a "Bo," "Safety," possessed with intent to distribute approximately 4 ounces of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) and Title 18, United States Code, Section 2.)

COUNT THIRTY-THREE

In or about October of 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, CARLTON ARNELL WILSON, a/k/a "Jug," did unlawfully, knowingly and intentionally distribute approximately 5 ounces of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT THIRTY-FOUR

In or about October of 2015, at Chesapeake, in the Eastern District of Virginia, the defendants, RONALD ANTONIO JOHNSON, a/k/a "Pooh," and RONALD GERARD YARBOROUGH, a/k/a

“Ron G,” “G.R.A.M.S.,” did unlawfully, knowingly and intentionally possess with intent to distribute approximately 5 ounces of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C)  
and Title 18, United States Code, Section 2.)

COUNT THIRTY-FIVE

On or about November 5, 2015, at Virginia Beach, in the Eastern District of Virginia, the defendant, AJENE HAMANI JORDAN, a/k/a “AJ,” did unlawfully, knowingly and intentionally distribute approximately ¼ ounce of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT THIRTY-SIX

On or about December 4, 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, RONALD ANTONIO JOHNSON, a/k/a “Pooh,” did unlawfully, knowingly and intentionally possess with intent to distribute twenty-eight (28) grams or more, that is, approximately 51.91 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).)

COUNT THIRTY-SEVEN

On or about December 4, 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, RONALD ANTONIO JOHNSON, a/k/a “Pooh,” did unlawfully, knowingly and intentionally possess with intent to distribute approximately 13.53 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT THIRTY-EIGHT

On or about December 4, 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, RONALD ANTONIO JOHNSON, a/k/a “Pooh,” did unlawfully, knowingly and intentionally possess with intent to distribute the following controlled substances:

- a) five (5) tablets containing Methylphenidate (Schedule II);
- b) two (2) tablets containing Clonazepam (Schedule IV);
- c) thirty-seven (37) tablets and tablet fragments containing Alprazolam (Schedule IV);
- d) approximately 1.43 grams of a mixture and substance containing 3,4-methylenedioxyethcathonine, also known as “ethylone” (Schedule I);
- e) six (6) tablets containing Buspirone (Schedule VI);
- f) five (5) tablets containing amphetamine (Schedule II); and
- g) four (4) tablets containing Oxycodone (Schedule II).

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNT THIRTY-NINE

On or about December 4, 2015, at Chesapeake, in the Eastern District of Virginia, the defendant, RONALD ANTONIO JOHNSON, a/k/a “Pooh,” did knowingly and unlawfully possess a firearm, to wit: a Ruger 9 mm semi-automatic pistol, in furtherance of a drug trafficking crime, that is, the drug trafficking crimes described and set forth in Counts One, Thirty-Six, Thirty-Seven and Thirty-Eight of this indictment, which are incorporated by reference herein, and which crimes constitute offenses for which the defendant may be prosecuted in a court of the United States.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT FORTY

On or about December 4, 2015, at Chesapeake, within the Eastern District of Virginia, the defendant, RONALD ANTONIO JOHNSON, a/k/a “Pooh,” having previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly and unlawfully possess a firearm in and affecting commerce, to wit: a Ruger 9mm semi-automatic pistol, that firearm

having previously been shipped and transported in interstate commerce.

(In violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).)

COUNT FORTY-ONE

On or about January 14, 2016, at Virginia Beach, in the Eastern District of Virginia, the defendant, AJENE HAMANI JORDAN, a/k/a "AJ," did unlawfully, knowingly and intentionally distribute approximately 6.3 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).)

COUNTS FORTY-TWO THROUGH ONE-HUNDRED AND EIGHT

On or about the dates and times set forth below, in the Eastern District of Virginia, the defendants, RONALD GERARD YARBOROUGH, a/k/a "Ron G," G.R.A.M.S., BRANDON ANTHONY STEPHENS, a/k/a "Killa," DETRON LASHANNON JACKSON, a/k/a "Bae Dollas," RONALD ANTONIO JOHNSON, a/k/a "Pooh," DEANGELO RAYDEL HYMAN, a/k/a "Bo," "Safety," and AJENE HAMANI JORDAN, a/k/a "AJ," charged in the counts set forth below, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone, in causing, committing and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21 of the United States Code § 841, as charged in this indictment, and conspiracy to distribute controlled substances and to possess controlled substances with intent to distribute, in violation of Title 21 of the United States Code § 846, as charged in this Indictment.



| Count | Date           | Time            | Defendants Charged with using the Communication Facility | Communication Facility Used | Call Session  |
|-------|----------------|-----------------|--|-----------------------------|---------------|
| 42    | April 14, 2015 | 17:37           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 37            |
| 43    | April 14, 2015 | 23:26           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 83-90         |
| 44    | April 15, 2015 | 12:17           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 108           |
| 45    | April 15, 2015 | 19:33           | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 77            |
| 46    | April 16, 2015 | 19:27           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 450           |
| 47    | April 17, 2015 | 11:18           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 553           |
| 48    | April 18, 2015 | 00:01           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 749           |
| 49    | April 18, 2015 | 23:21           | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 519           |
| 50    | April 19, 2015 | 16:41           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 983           |
| 51    | April 20, 2015 | 19:38<br>19:52  | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 1156<br>1164  |
| 52    | April 20, 2015 | 22:56-<br>23:20 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 1188-<br>1194 |
| 53    | April 21, 2015 | 19:16           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 1262          |
| 54    | April 21, 2015 | 21:09           | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 955           |
| 55    | April 21, 2015 | 21:25           | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 961-<br>978   |
| 56    | April 22, 2015 | 11:17           | BRANDON ANTHONY STEPHENS<br>RONALD GERARD YARBOROUGH     | 757-***-9965                | 1359          |
| 57    | April 22, 2015 | 14:46           | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 1106          |
| 58    | April 23, 2015 | 20:29           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 1647          |
| 59    | April 24, 2015 | 00:49           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 1703          |

| Count | Date           | Time  | Defendants Charged with using the Communication Facility | Communication Facility Used | Call Session |
|-------|----------------|-------|--|-----------------------------|--------------|
| 60    | April 25, 2015 | 00:12 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 1813         |
| 61    | April 25, 2015 | 15:57 | BRANDON ANTHONY STEPHENS<br>RONALD ANTONIO JOHNSON       | 757-***-6695                | 1516         |
| 62    | April 26, 2015 | 19:26 | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 1650         |
| 63    | April 26, 2015 | 23:39 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 2074         |
| 64    | April 27, 2015 | 18:35 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 2234         |
| 65    | April 28, 2015 | 14:01 | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 1904         |
| 66    | April 29, 2015 | 00:55 | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 1987         |
| 67    | April 29, 2015 | 23:37 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 2536         |
| 68    | April 30, 2015 | 14:29 | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 2172         |
| 69    | April 30, 2015 | 23:38 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 2758         |
| 70    | May 1, 2015    | 14:03 | BRANDON ANTHONY STEPHENS<br>DETRON LASHANNON JACKSON     | 757-***-6695                | 2345         |
| 71    | May 1, 2015    | 14:05 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 2800         |
| 72    | May 2, 2015    | 11:33 | BRANDON ANTHONY STEPHENS<br>RONALD GERARD YARBOROUGH     | 757-***-6695                | 2947         |
| 73    | May 2, 2015    | 18:11 | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 2633         |
| 74    | May 3, 2015    | 11:37 | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 3178         |
| 75    | May 3, 2015    | 14:34 | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 2826         |
| 76    | May 4, 2015    | 16:20 | DETRON LASHANON JACKSON                                  | 757-***-8788                | 3010         |
| 77    | May 5, 2015    | 21:36 | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 3255         |

| Count | Date         | Time            | Defendants Charged with using the Communication Facility | Communication Facility Used | Call Session  |
|-------|--------------|-----------------|--|-----------------------------|---------------|
| 78    | May 5, 2015  | 23:26           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 3430          |
| 79    | May 6, 2015  | 13:20           | DETRON LASHANNON JACKSON                                 | 757-***-8788                | 3362          |
| 80    | May 6, 2015  | 18:33           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 3636          |
| 81    | May 7, 2015  | 16:39           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 3769          |
| 82    | May 8, 2015  | 16:07<br>16:29  | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 3895-<br>3897 |
| 83    | May 9, 2015  | 17:35           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 4060          |
| 84    | May 10, 2015 | 12:34           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 4182          |
| 85    | May 15, 2015 | 18:19           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 4613          |
| 86    | May 16, 2015 | 21:57           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 4862          |
| 87    | May 17, 2015 | 13:02           | RONALD GERARD YARBOROUGH                                 | 619-***-7157                | 434           |
| 88    | May 18, 2015 | 17:32-<br>19:30 | RONALD GERARD YARBOROUGH<br>DEANGELO RAYDEL HYMAN        | 619-***-7157                | 748-<br>770   |
| 89    | May 18, 2015 | 20:21           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 5259          |
| 90    | May 19, 2015 | 16:58<br>17:07  | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 5372<br>5374  |
| 91    | May 19, 2015 | 19:03           | RONALD GERARD YARBOROUGH                                 | 619-***-7157                | 1118          |
| 92    | May 19, 2015 | 19:25           | RONALD GERARD YARBOROUGH<br>AJENE HAMANI JORDAN          | 619-***-7157                | 1135          |
| 93    | May 20, 2015 | 19:27           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 5544          |
| 94    | May 21, 2015 | 14:51           | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 5680          |
| 95    | May 21, 2015 | 15:53<br>15:57  | RONALD GERARD YARBOROUGH                                 | 619-***-7157                | 1583-<br>1586 |

| Count | Date         | Time           | Defendants Charged with using the Communication Facility | Communication Facility Used | Call Session |
|-------|--------------|----------------|--|-----------------------------|--------------|
| 96    | May 26, 2015 | 14:26          | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 6353         |
| 97    | May 27, 2015 | 13:05          | RONALD GERARD YARBOROUGH                                 | 619-***-7157                | 3176         |
| 98    | May 27, 2015 | 13:37          | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 6448         |
| 99    | May 27, 2015 | 20:40<br>20:43 | RONALD GERARD YARBOROUGH<br>RONALD ANTONIO JOHNSON       | 619-***-7157                | 3240<br>3243 |
| 100   | May 29, 2015 | 13:34          | RONALD GERARD YARBOROUGH<br>AJENE HAMANI JORDAN          | 619-***-7157                | 3603         |
| 101   | May 29, 2015 | 20:09          | RONALD GERARD YARBOROUGH                                 | 619-***-7157                | 3765         |
| 102   | May 30, 2015 | 00:29          | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 6751         |
| 103   | May 30, 2015 | 15:18          | BRANDON ANTHONY STEPHENS<br>RONALD GERARD YARBOROUGH     | 757-***-6695                | 6816         |
| 104   | June 2, 2015 | 15:58          | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 7112         |
| 105   | June 4, 2015 | 13:28          | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 7290         |
| 106   | June 5, 2015 | 13:56          | RONALD GERARD YARBOROUGH                                 | 619-***-7157                | 4647         |
| 107   | June 8, 2015 | 18:06          | BRANDON ANTHONY STEPHENS                                 | 757-***-6695                | 7781         |
| 108   | June 9, 2015 | 15:33          | RONALD GERARD YARBOROUGH<br>BRANDON ANTHONY STEPHENS     | 757-***-6695                | 7807         |

(All in violation of Title 21, United States Code, Section 843(b)  
and Title 18, United States Code, Section 2.)

#### FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts 1 through 6, 8, 10 through 13, 15 through 38, and 41 through 108 of this Indictment, shall forfeit to the United States, as

part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:

- a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation; and
- b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation.

2. The defendants, if convicted of any of the violations alleged in this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition involved in or used in the violation.

3. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

4. The property subject to forfeiture includes, but is not limited to, the following property:

- a. A monetary judgment in the amount of at least \$7,171,935.00, which represents the proceeds of the Title 21 offenses;
- b. A Ruger Model LC9 9 mm semi-automatic pistol, seized on December 12, 2015 by the Chesapeake Police Department at an apartment in the 1800 block of Sparrow Road, Chesapeake; and
- c. A 2010 Porsche Panamera, VIN #WP0AB2A77AL062159, registered to Tarsha Latrease Williams.

(In accordance with Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code, Section 2461(c)).

United States v. Ronald Gerard Yarborough, et al  
Criminal No. 2:16-cr- 85

A TRUE BILL:

Redacted  
FOREPERSON

DANA BOENTE  
UNITED STATES ATTORNEY

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